

Name: Anthony Jeffrey Christensen

Address: Sanpete County Jail PO Box 130 Mont. UT. 84642

P. 110 F. 12

IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH
CENTRAL DIVISION

2019 AUG 13 P 1:57

Anthony Jeffrey Christensen
Plaintiff, prose.

MOTION TO FILE SUPPLEMENTAL
COMPLAINT

DISTRICT OF UTAH

CLERK

v.

Robert Braithwaite "etal"
Defendants

Civil No: 2:17-cv-1123-cw

- 1.) I am a pre-trial, pro se plaintiff with very limited legal access. Under the Federal RULES of Civil Procedure rule 15(a) and 19(a) Court should grant leave freely to amend my Complaint. [Foman v Davis 371 US 178, 182 1962]
- 2.) Federal Rule of Civil procedure Rule 15(d) Gives me the right to file a Supplemental Complaint. Further more Under Rule 5b(f) Honorable Judge has the power to issue just Order, Since most Courts will Consider on going violations of Constitutional rights to be irreparable injury, than granting this motion would be appropriate.
- 3.) [Gilmore v Lynch 319 F. Supp 105 111 N. D CAL 1970] Holding the right entails all the means a petitioner might require to get a fair hearing from judiciary. (aff'd) Sub. norm. [Younger v Gilmore 404 US 15 92 S. Ct. 250 1971] per Curiam.
- 4.) Amending the Complaint will give me equal opportunity to address the issues. "related": [Morse v McWhorter 290 F3d 795, 799 6th Cir 2002]
[Curley v Perry 246 F3d 1278, 1284 10th Cir. 2001]

"
Quick Argument"

- 5.) Your honor, thank you for your patients. "At no time am I trying to become a burden". I have a mental, and emotional disability, a learning Curve where its difficult to focus, and understand especuallly without my medication.

Signature: 

Print Name: Anthony Christensen

Date: 8-12-2019

- 6) High rank deputies tell me they don't care about my constitutional rights with a judge tells them otherwise, I've exhausted every avenue possible above, and beyond, the normal expectations.
- 7) To the point I get treated rudely, and retaliated against, "Threatened with disciplinary sanctions for using the grievance or Appeal process, Out of retaliation I'm being charged new felony charges." Because I filed a law suit.
- 8) Before coming to this jail, I have no prior experience, knowledge or understanding how to file a law suit. I never needed to sue or even put thought into Constitutional Amendments.
- 9) I broke the law before, I go to jail. Never in my life have I been treated like this. "Ever" I believe the family of my alleged victim works here, therefore the deputies are talking justice in their own hands. Or they believe they are above the law.
- 10) Jail staff goes above, and beyond to hinder, Impede my legal access. It is so bad that my family bought me 2 legal books from the Dept. of Justice, Human rights, "A federal prisoners self help litigation manual, and criminal law to help with my case.
- 11) Better than what I had before, "Nothing". So when this court or defendants quote cases if I haven't read them in my book, I have no way to look them up. My book only gives the citation or a really brief synopsis.
- 12) I feel a little more confident to present my complaint. I feel it's to the point. It is easier to read, and understand, and I've categorized, and provided brief synopses to all exhibits. Therefore this motion shall be granted. Respectfully.
- 13) I Certify this is true pursuant to Federal 28 U.S.C. 55 1746. Penalty of perjury.

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IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH
CENTRAL DIVISION

Anthony Jeffrey Christensen
Plaintiff,

v.

Robert Braithwaite "etal"
Defendants

SUPPLEMENTAL AMENDED COMPLAINT.

Honorable Judge: Clark Waddoups,
Civil No: 2:17-CV-1123-CW

1 JURISDICTION & VENUE

- 1) This is a Civil action authorized by 42 U.S.C Section 1983 to redress the deprivation under Color of state law of rights Secured by the Constitution of the United States of America. Also the "RLUIPA" Religious land, and institutionalized persons act.
- 2) This Court has jurisdiction under 28 U.S.C Section 1331, and 1343 (a) (3). Plaintiff Seeks declaratory relief pursuant to 28 U.S.C Section 2201, and 2202.
- 3) Injunctive relief needed will be authorized by Section 2283, and 2284 28 U.S.C, and rule 65 of the Federal Rules of Civil Procedure.
- 4) Plaintiff Seeks Compensatory and punitive damages. Im entitled to relief therefore demand that relief Sought.
- 5) I demand a jury trial on all issues triable by jury.
- 6) The Central Division of Utah is an appropriate Venue under 28 U.S.C ss 1391 (b) (2) because it is where the events giving rise to the Claim occurred.
- 7) Rule 8 of the Federal Rules of Civil Procedure gives this Court the jurisdiction, and Venue needed to process this Case.

11. PLAINTIFF

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8) Plaintiff, Anthony Jeffrey Christensen, is and was at all times mentioned herein a pre-trial detainee at the Sanpete County Jail or prisoner of the state of Utah. I am currently confined at this address: Sanpete County Jail PO Box 130 Mont. Utah 84642 / Telephone: 435.835.2195. "I am a Citizen of Utah"

III. DEFENDANTS

9) All the defendants are citizens of Utah, and acted under the authority or color of the state law at the time this occurred. Defendants are or were employed at the Sanpete County Jail at this address: 1500 South Hwy 89 Mont. Utah 84642 / Phone #, 435-835-2195 "Each defendant is sued individually and in his/her official capacity."

A. Robert Braithwaite 'Captain'	K. Mr. Gates 'Sergeant'
B. Brad Bawn 'Lieutenant'	L. Glen Niel 'IDHO officer'
C. Jeff Nielson 'Sergeant'	M. Amanda Bonnett 'Secretary'
D. Ross Bailey 'Sergeant'	N. Mr. Larsen 'Deputy' mentioned but not sued.
E. Gretchen Nunley 'Sergeant'	O. Mike Christensen 'Sergeant' mentioned but not sued.
F. Dale Christensen 'Deputy'	P. Chad Imley 'Deputy'
G. Van Christensen 'Deputy' - Mentioned but not sued.	
H. Brandon Brown 'Deputy'	
I. Kathy Robins 'Deputy'	
J. Keith Nunley 'Deputy'	

IV EXHAUSTION OF LEGAL REMEDIES

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- 10.) I've personally reported to deputies, filed inmate request forms, utilized the inmate grievance procedure Level 1, and level 2 until January 7, 2019 when the rule book was revised adding in Level III. "Exhibit 2."
- 11.) Several grievances or Appeals were not answered. I was indigent, and not provided photo copies. They 'disappeared' Especially my 1st disciplinary Appeal. I wrote it twice; 'disappeared'. I wrote a grievance; 'disappeared'. So I started hand Copying them for my records'
- 12.) Even when my grievances were delayed past the 7 day time limit per policy, I gave the benefit of doubt, and filed the Second level.
- 13.) Second highest rank deputy Lt. Brad Bown Said, "he doesn't Care about my Constitutional Amendments until a judge Orders other wise. He will Continue to do what he does Exhibit 24
- 14.) July, and September 2017, again July 2019. I attempted to file motions in 6th District Court Judge Lee Criminal Case: 171600078. He stated the Constitutional issues were for State Tort or federal 1983. Not for his Court. Exhibit 13
- 15.) I attempted to file a Rule 65(B) Petition for Extraordinary relief. Case No: 190600013. The Honorable Judge Bagley first made the mistake thinking the issues were already adjudicated in Judge Lee's Court so he dismissed my claim.
- 16.) This is now my fifth attempt to raise issues appropriately within this Courts jurisdiction. With out legal access, training or education. "Yes I have a basic understanding now how to get my Claim to Court." "Everything else I'm Hindered" related to:
[Percovich v Zavaras 84 F3d 1399, 1403 10th Cir 1996]
- 17.) I've requested several face to face meetings with jail staff to no avail. They Conduct 'Secret Sgt. Meetings' where they provide no notice or due process. They decide what to do, and lower rank deputies follow through per. Captain Robert Branthwaite or per. Sgt. Meeting. They use their decisions against me in my grievances, and appeals without letting me defend my self.

V. LEGAL CLAIMS

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18) A.) Count 1: "Deprivation of religious freedom," ie Church Service. 2 1/2 years without due process I have been denied Church Services. The willful and malicious Conduct of Robert Brathwaite, and all the defendants named in the Complaint Violated my 1st, and 14th Amendment except for Amanda Bennett, and Glenn Niel. Also Violating the RLUIPA Act. Religious land, and institutionalized persons act Under the Constitution of the United States of America. Exhibits 1, 8, 10, 13, 17, 21, 23, 30, 36

19) B.) Count 2: "Placing me in Administrative Segregation without providing due process."

Authorizing a System that deprived me life, liberty, and property while violating the Constitutional rights, 2 1/2 years in Admin Seg without due process violates my 14th Amendment, and should be 8th Amendment Cruel and Unusual punishment, All defendants except Amanda Bennett, and Glenn Niel Violated my rights of the Constitution of the United States of America.

Exhibits 11, 13, 17, 20, 21, 30, 31, 33, 34, 36

20) C.) Count 3: "Five Separate 'Unlawful excessive Confinements' Species of false imprisonment.

118 days total without a hearing or during a disciplinary hearing where I was denied the basic rights of due process. 18 days left in 'receiving' a non housing area. After being Classified to general population. Locked down 10 more days in a cell. Given a 'negligent' disciplinary hearing 30 more days in a cell. Upon Completion I was given 30 more days modified lock down. Plus another 30 for a Second negligent disciplinary hearing. Denied due process Violates my 14th and Cruel and Unusual of the 8th Amendment Under the Constitution of the United States of America. Robert Brathwaite, Brad Bown, Glenn Niel, Jeff Nielsen, Gretchen Nunnley, Dale Christensen, Chad Imray are responsible for the willful and malicious Conduct,

Exhibits 1, 2, 3, 11, 12, 13, 14, 15, 17, 35, 36

21) D.) Count 4: "Unlawful Restraint" and "deprivations to the recreation yard"

Exhibits 7, 10, 13, 17, 20, 21, 24, 25, 32, 36

42 days in restraints restricting all movement, and exercise. Denied 122 days rec. for sure. 168 days total for the 28 days lock down, 30 for 1st disciplinary, 30 for modified, 30 for Second disciplinary. Plus 7 extended days deprived past modified lock down.

Plus Discovery will prove all the missed days from October 30th 2017 - Present where an officer had to be with me. He didn't feel like going then I Couldn't go. All other inmates went though. No due process. Violates 14th and 4th and 8th Amendments of the Constitution. "All defendants except Glenn Niel, and Amanda Bennett, Are responsible."

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22.) E.) Count 5: "Legal Access Claim" 1. "Right to assistance" 2. "Interference" 3. "Retaliation"

"Impeded, hindered, prejudiced, denied, stopped" and "retaliated" against, Being denied Legal access for out of state. I defaulted my divorce it was closed. Accord to [Bounds v Smith] access to law library or Adequate people trained in law to help with Criminal Case, Habeas or 1983. I'm denied any and all legal means to do this. Sanpete provides "Nothing".

23.) Because I have no understanding or ability provided to research I filed a rule 65(B). It was dismissed. My first and second 1983 were dismissed. One is on Appeal. Because I don't have access to Appellant Rules I got penalized 3 times. #1. Reply brief was too many pages had to re-write it 15 pages in 3 1/2 days. #2 Default got denied because I applied the wrong rule. #3 my Exhibits got denied because I didn't follow a rule. I don't have access.

24.) I'm indigent, and supposed to get "Free" legal supplies per Supreme Court law. Instead they charge a secret debt until September 2017 when I first found out. Now I get charged for every single legal item I use. i.e. paper, envelope, postage, photo copy. "Because of the illegal debt, if I get sent money they keep 100% of it. § 241 State tax. Policy says at most they can only take 60%."

25.) I was locked down 28 days plus 30 days the 1st disciplinary without phone access to my Attorney 58 days. The 1st disciplinary 30 days, second 20 days, third 30 days and fourth 5 days I had no access to phone at all to call family. 85 days total.

26.) For 5 months Deputies photo copy my legal work and would not let me be there. Invasion of privacy. April 1st 2017 - August 31st 2017. They opened ACLU Legal mail, read that I wanted help with a law suit and was denied further access to them. (Retaliation and interference.)

27.) Because I filed a law suit they filed felony charges for the two disciplinary write ups I got. Retaliation. District Attorney offered to drop the case if I drop the law suit. He then offered when I told him no. If I plead to one felony he won't charge the other one. Deputies Deliberate indifference caused both situations to happen. Now I get punished.

All defendants willful and malicious conduct violated my 1st, 4th, 6th, and 14th Constitutional Amendments of the United States of America.

Exhibits 4, 5, 6, 10, 13, 16, 17, 18, 19, 20, 21, 22, 24, 26, 27, 28, 29

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F.) Count 6: "Conversion"

28.)

Amenda Bennitt, Robert Branthwaite, Brad Bown, Jeff Nielsen Caused the illegal debt for legal supplies so when I filed my taxes \$241 dollars was sent to the jail, They kept 100% of it later paying the Court three checks at 20%, and then keeping the rest, I never gave Consent or my authorization. I never even signed the check, This is a 4th, 5th and 14th Amendment Violation of the Constitution Under the United States of America. "No due process provided."

Exhibits 9, 13, 20, 22, 29

G.) Count 7 & 8: "Disciplinary hearings Violating due process"

29.)

These hearings Created liberty interest, deputies deliberate indifference in both cases Caused unsafe conditions, Violating my 6th, 8th, and 14th Amendments Under the Constitution. Glenn Niel, Robert Branthwaite, Brad Bown, Jeff Nielsen, Brandon Brown, Gretchen Nunnley, Dale Christensen, Chad Imley, Keith Nunnley, Kathy Robins, Sgt. Charles were responsible and Ross Barley. They violated my right to Attorney, Created cruel and unusual punishment and due process violations, of the Constitution Under the United States of America.

Exhibits 12, 3, 11, 12, 13, 14, 15, 17, 35, 36

H.) Count 9: "Retaliation"

30.)

Both Disciplinary Sanctions deputies were deliberately indifferent So 2 1/2 years after the 1st disciplinary during the Second one I appealed, and filed grievances. Defendants assumed I was going to sue again. Ross Barley, Brad Bown, Glenn Niel. So they reported to Robert Branthwaite who decided if I'm going to sue, they will file felony charge on each disciplinary.

31.) District Attorney told my Attorney if I drop the law suit he will drop the charge. I said no. July 25th 2019 he charged me 1 felony so far. In Court August 7th he offered to drop one if I plead to the Second I said, no. For retaliation those 4 defendants violated my 1st, and 14th Amendments Under the Constitution of the United States of America.

32.) Some Constitutional violations maybe under different categories. I put this together with very minimal legal material to help me. I pray the Court will decide those issues.

Exhibit 7, 11, 12, 14, 15, 17, 19, 20, 21, 23, 24, 26, 27.

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VI DECLARATION OF FACTS

- 33.) I Anthony Jeffrey Christensen bring this Complaint on the record, and before the Honorable Judge to snuff the flames of withering injustice.
- 34.) I was told by LT. Brad Bown, Second highest rank deputy in charge at this jail. "He does not care about my Constitutional rights, until a judge orders otherwise. Exhibit 24"
- 35.) I filed this Supplemental Complaint because new violations have happened since I filed the Orig. Retaliation, and new Felony Charges filed against me because I filed a law suit.
- 36.) I use the word "Secret Sgt. Meeting" meaning Robert Braithwaite, Brad Bown, and Jeff Nielsen meet in private. They decide how things will be without providing due process. They decide, and there are no if, and's or but's. No chance to dispute.
- 37.) Even grievances, and Appeals do no good. Request straight to Brad Bown or Robert Braithwaite do no good. They won't even meet me face to face.
- 38.) Usually some low rank deputy will just say per Captain or per Sgt. Meeting this happened, and this is how it is. I personally send Supreme Court law, they are deliberately indifferent to it. Or they give retorical, vague responses quoting case law they know I can't research. "No legal access".
- 39.) I've never met sadistic, and malicious deputies who treat me the way the Sanpete defendants do. My alleged victim's family comes to this jail. I truly believe they are just taking justice in their own hands.
- 40.) I'm a prose pre-trial, indigent detainee I've been here 2 1/2 years and counting.
- 40.) "So here is a list of wrongs, I pray this Court will make right."

VII STATEMENT OF FACTS

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41.) A. "Count 1: Deprivation of religious freedom" Exhibits 8, 10, 23, 17, 21, 13, 1, 30, 36

42.) Since Coming to this jail April 1st, 2017 I was told to declare a religion, "Catholic". For the first 28 days I was locked down in my cell or kept in receiving, a non housing area. So I was not allowed Church at all.

43.) April 30th Church Service was Called, I attempted to go. The deputy believed to be Chad Imby said, "he doesn't think I'm allowed Church Service." Because of my Charges. He would look into it. Dale Christensen, Chad Imby and Sgt. Nunley Confirmed that during a "Secret Sgt Meeting", I was not allowed Church Service for "Safety" and "Security reasons". Robert Braithwaite, Brad Bown, and Jeff Nielsen decided this without due process.

44.) I started learning Asatru which I really started to like. I seen once a month the members got a diet meal, they ate together, and feasted giving thanks. So I requested the accommodations. Sgt Nunley told me I'm Catholic, I had to change my sect to Asatru to get the benefits. So I studied and made sure I understood the religion. So December 2017 I changed my sect to Asatru.

45.) I still wanted Christian Service so multiple times I attempted to go. Every time I was given the same answer. I'm not allowed per Captain Braithwaite. So I filed a grievance. It did no good. That's when I first learned I was on Administrative Segregation. Jeff Nielsen answered it. June, 29th 2017. "No due process provided." Exhibit 17

46.) On 11-10-2017 I sent a grievance. Ross Bailey vaguely blew it off saying my issues were already addressed. "Exhibit 21"

47.) On 3-10-2018 I filed a grievance for Church Service. Ross Bailey denied it, and said it was a Safety and Security issue. No due process provided. "Exhibit 23"

48.) So on 7-4-2018 I sent a request to the Captain. He now used my changed religious sect Asatru against me. Sanpete doesn't have Asatru Service. That the LDS Bishop would meet with me.
Exhibit 10

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49.) So 910 days and counting I've been denied Church Service without due process. This violates my 1st, and 14th Amendments, and the RLUIPA. - Religious land and institutionalized persons act. Because "Sanpete County jail accepts Federal funding."

50.) RLUIPA Act States: If state or local government accepts federal funds for their Correctional programs they must satisfy the Compelling interest / least restrictive means standard to justify placing substantial burdens on prisoners religious exercise.

51.) Substantial Burden: Exists where a prisoner will lose benefits available to other prisoners by following his religious precepts. "Not being allowed Church Service."

52.) Attending Church Service even of different beliefs is necessary for me to achieve meaningful satisfactory religious exercise. The Constitution, and RLUIPA Act protect each individuals beliefs. "You do not need to belong to an established Church or Sect." Displacing interest in other religions does not show ones own beliefs are insecure.

53.) Other inmates of my religion Asatru are allowed any and every Church Service, and group provided. "Just not me." Matt Thompson is Asatru, who went with state inmates even though he was a County inmate. To Mormon Church Service. "John the blue Crystal Shield polygamist," was on Admin Seg. and P.C. status yet they allowed Church with County and state for him. "Not me"

54.) On Easter 2019 the high rank deputies were not here. So lower rank let me go to mormon Service. Not one single issue. Matter of fact I was told it was a delight to meet me they hope I come back. "I've been denied Since"

55.) If provided due process under a finding of legitimate penological interest if Administration is concerned about "Safety" or "Security" there are two alternative methods to allow Service without violating my rights.

A. Jail may require closer supervision of Service by staff. "Being in close proximity"

B. Allow prisoners of different Security levels to attend Separately.

B. Count 2: "Administrative Segregation" Exhibit 1,

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↓ 11, 13, 17, 20, 21, 30, 31, 33, 34, 36

56.) Authorizing a system that deprives me liberty, life, and property while using the excuse of "Safety" and "Security" later when I file grievances to cover for not providing due process. By high rank deputies during Secret Sgt. Meetings. To decide how I get treated.

57.) When I first got here April 1st 2017, the next day I was classified for General population by Boss Bailey. He never took me to general population. "Exhibit" 1

58.) I was left in receiving a non housing area for 18 days. During a "Secret Sgt. Meeting" they Robert Brathwaite, Brad Brown, and Jeff Nielsen decided to classify me maximum security and place me on Administrative Segregation. I was given no notice. So when I was taken to housing April 18th I was locked in the cell 10 more days.

59.) Admin Seg. is supposed to be non punitive, but imposed pending investigation of "misconduct" charges. To prevent future misconduct or other violations of security and order. "I had no misconduct and I was not under investigation." "I've never been to this jail before."

60.) So when I was classified for general population not Admin Seg. or Maximum Security. Nothing more. During a meal around April 30th I asked Chad Inlay why I was being treated differently. He said, it's above his pay grade he just does what he's told.

61.) So I asked Dale Christensen, he said because my charges, I'm high profile. So that's why I got locked down to monitor my behavior. "I'm not sentenced, I'm not on death row, or even facing the death sentence." He said, that's just what the Captain said. "Secret Sgt. Meeting"

62.) So I was denied church and self help groups, and for 42 days denied and side recreation unless I was shackled. I was locked down 30 days to monitor my behavior. All because during a "Secret Sgt. Meeting" they decided to do this without providing due process.

63.) So for 910 days or 2 1/2 years I've been on admin seg. without a update or notice or hearing. No investigation, no disciplinary reasons. Just a vague excuse of Safety and Security which is an excuse. They house me with state and county inmates, without a conflict check. They house me with alleged victims family, and friends.

64) Supreme Court, said it was the same as officials would not put a prisoner in Admin Seg.

Unless one of these reasons was present. This created a liberty interest to stay out of Seg.

Therefore the prisoner was entitled to procedural protections to make sure the reason for Seg.

"Actually existed," I don't safety is excuse. Exhibits 30, 31

65) C. Count 3. Five Separate "Unlawful excessive confinement" (Species of false imprisonment)

Exhibits 1, 2, 3, 11, 12, 13, 14, 15, 17, 35, 36

66) April 1st - April 28th 2017 I was held in non housing receiving area without cold running water. Russ Bailey classified me to general population, but never moved me. Exhibit 1

67) Dale Christensen told Sgt. Mumley they should do what they do at the prison. Look me down

30 days to monitor my behavior since I had a high profile charge. She thought it was a good

idea so she took it to the secret seg meeting. So they decided to do that to me without due

process.

68) I complained I wanted move and it was unconstitutional to leave me locked down

with out cold water. On two occasions they brought me a cup of ice. Von Christensen,

Chad Imley, Dale Christensen, Gretchen Mumley all said they would put work orders on the

water issue. If never got fixed.

69) So I spent 18 days in receiving area. related Benjamin v. Stiff 952 F. Supp 140, 148 S.W.2d 1999 "150 per day inmates held more than 24 hrs.

"Second Unlawful Confinement"

70) After the 18 days I was taken to housing section by Gretchen Mumley and Chad Imley

They locked me in my cell 10 more days. April 18th - 28th, 2017. I was told I would

finish the 30 days lock down to monitor my behavior, and then I would be released.

71) They were still trying to figure out exactly what they wanted to do with me and

what they would allow or not allow, and for me to be patient and hang in there.

72.)

4. (G.)

2A (H) //

"(H)"

Count 7: Disciplinary hearing, Count 8: Second Disciplinary hearing, Count 9: Retaliation

73.)

74)

75.)

76.)

77.)

78)

78.) May 25th 2017 leaving my hearing Brandon Brown, and Gretchen Nunnley were standing out side my Section. I asked Brandon why he didn't curb the issue. He said, he reported the conflict yesterday to Gretchen. First she tried to deny it, Brandon corrected her, and said "I told you." She then said, "oh shoot I got busy I didn't think you'd hit the guy."

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79.) "It was self defense he threatened me, and reached for a weapon". She said it's only 30 days better than a new charge. Just accept it because I got lucky, it could be worse.

80.) So I did the 30 days lock down without problems. June 22nd I was supposed to be off lock down. "Nope" Secret Sgt. Meeting they decided to give me 30 more days modified lock down. Without due process. Jeff Nielsen, Gretchen Nunnley made the schedule and took my rec. I grieved. "Exhibit 17"

81.) June 23rd Sgt. Nunnley came down, and told me I'd be allowed 5 hours out of my cell for 2 weeks, then 10 hours out for 2 weeks, and if I was good I'd be restored to normal where I came out 7AM-10pm. I completed 30 days modified lock down with no problem. Still not allowed, rec. until July 28th 2017. "(They never filed Criminal Charges)" Yet!
Second Disciplinary hearing.

82.) July 15th 2019.

The actions of Glenn Niel when he conducted the hearing were exactly the same where he refused to call my witnesses, found me guilty because video footage without allowing me to see the evidence. Provide no written disposition of the charges. The major difference was I was wrote up for a B-02 if found guilty 20 days lock down.

83.) Someone wrote A-02 Assault on his paper, so I was not given 24hr notice of the new charge. He found me guilty of the A-02 Assault, and dismissed the B-02. He gave me 30 days lock down. Provided no attorney or Miranda. Inmate assault is a felony charge.

84.) He wouldn't listen to my defense. Kathy Robinson, Kieth Nunnley, and Sgt. Gates assaulted the inmate, and forced him in the section hand cuffed. He refused housing because of conflicts he wanted housed in medical holding because there is no P.C. July 2019

85.) They "Kieth Nunnley" and "Sgt. Gates" said, he will be moved out of the section when he gets off of TRB. Sgt. Gates said, he doesn't know what to do with the inmate he has behavioral, and housing issues everywhere he goes.

86.) They went off shift. Dale Christensen released him from TRB leaving him in the section. He wrote a grievance to be moved due to conflicts. Ross Bailey denied it. He Appealed Brad Bawn denied it. He was left in the section until 7-11-2019 the day after we got into it.

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87.) Deputies Dale Christensen, Kathy Robinson, Keith Munnley, Sgt. Gates were deliberately indifferent and their failure to take disciplinary or other action to curb the known pattern of threats and abuse to the point deputies assaulted and forced the inmate in my section, denied his grievance and Appeal is proof the continued deliberate indifference to my safety and safety of other inmates contributed to and proximately caused an assault.

88.) Glenn Niel refused to provide the evidence. "I know there are Level 11 of the grievance procedure because the new revised hand book says so." There used to only be 11 leveles. Revised Jan. 2019. Exhibit 2

89.) So I only assumed there are 3 levels to the Appeal process. The rule book doesn't say anything about Appealing a disciplinary. So I filed 3 levels of appeal. Ignored on the level 3. I slid a cup of coffee so I got a write up. "Exhibit 14"

90.) I went to my hearing where I was threatened by Glenn Niel with a write up for abusing the system. I explained I have a right to redress the government and in order to bring litigation I have to exhaust administrative remedies. August 1st 2019,

* 91.) So I wrote a grievance where 8-3-2019 Ross Bailey said it appears, I'm trying to sue them again, I explained my rights to exhaust. "Exhibit 11"

* 92.) So my lawyer showed up he said since I filed a law suit or a Rule 65 B actually they would file felony charges. District Attorney said if I drop the law suit he will drop the charge. August 7th, 2019 I went to Court.

* 93.) District Attorney said, if I plead to one felony he will never charge the second one, and I drop the law suit. I said, no so now he is filing a second felony for the 1st and 2nd disciplinary write ups I got. "Clear retaliation for my law suit."

* 94.) So I was given 30 days each lock-down total 90 days in violation to my due process rights. Plus the 28 in the first and second. That's "118" days of a species of false imprisonment. Retaliation of not 1 but 2 felony charges facing maximum 10 years, 5 years each charge. (New felony charge) Exhibit 12

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D. "Count 4: Unlawful Restraint - Deprivations to the rec. yard."

Exhibit 7, 10, 13, 17, 20, 21, 24, 25, 32, 36

95) 42 days in restraints, 122 missed recreation days total 164. Plus 22 months and counting of missed days between October 30th 2017 - Present.

96) Because I got here April 1st 2017. Spent 28 days locked down. "Secret Sgt. Meeting" decided to lock me in hand cuffs, belly chains, and ankle cuffs, full body restraints, to take me out to rec yard. Completely restricting any mobility to exercise.

97) Sgt. Nunnley passed the requirement to the two Corridor officers Chad Inlay and Dale Christensen. So per orders they put me in strains every time without due process. If I refused they denied me yard.

98) Around April 30th I started making phone calls to my family about Cruel and Unusual punishment they started letting me go out in May 12th without restraints.

99) I served the "30" day disciplinary without rec yard. I was given the "30" day modified lock down without rec yard plus another "Seven days". I served a "20" day sanction, another "30" and another "5" without rec yard at all.

100) Finally July 28th 2017 I was able to go to rec yard with my Section normal until October 30th, 2017. For no reason, with no sanction and having done nothing wrong I was told I could not go out side past 5pm, and a deputy had to go out with me. (Kathy Robinson)

Exhibits 25, 24, 7, 10

101) So while other inmates go out average 5 hrs per week, I'm lucky to see 1 or 2. Because the deputy doesn't feel like going out. I usually will get 1 or 2 days per week. When I got locked down I kept track just to see. My Section went out 15 days straight. I'd be lucky to see 15 days in 2 or 3 months. Exhibit 32 25

102) November 2017 while doing photo copies I ran in to Brad Bawn. Second highest rank deputy. He said, he doesn't have to explain or tell me why he took my rec yard. If the judge wants to know he will tell the judge. Until then he doesn't respect my Constitutional rights and I should feel lucky to go out side at all. Exhibit 24

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103.) When I was being restrained for yard I asked Dale Christensen why I was being treated that way. First he said, the District Attorney wanted it that way. I motioned the judge in my Criminal Case, of course the D.A. denied it. (July 2017, and Sept 2017.)

104.) Honorable Judge Lee said my Constitutional Charges were for a Court above his or not for his Court. (State tort or federal 1983.) July 31 2019 "Exhibit 13"

105.) I asked Dale, and Chad how other inmates go out side. Deputy takes them out locks them in the yard and leaves 30 min - 1 hr. Comes back and gets them. I was taken out 15 min - 30 min. With very little movement, the cuffs dug into my skin causing too much pain to even walk around.

106.) In the only inmate put in restraints for yard. Im the only inmate not allowed out after 5 pm. Im the only inmate a deputy has to go out side with me. Without due process.

(E.) (F)

Count 5 and 6 Denied legal Access, and Conversion "Im Combining them together"

Exhibits 45, 6, 9, 10, 13, 16, 17, 18, 19, 20, 21, 22, 24, 26, 27, 28, 29

107.) "Supreme Court established that prisoners meaning "jail", prison or institution inmates have a fundamental right to access the Court. [Ex parte v. Hull 312 US 546 1941] [Johnson v Avery 383 US 483 1969] [Bounds v Smith 430 US 817 1977]

108.) This right allows you to file Section 1983 or Bivens Claims, Habeas petitions or to work on your Criminal Case. The right is fundamental that it requires a prison/jail to find a way for you to have meaningful access to the Court. They can provide decent law libraries - or - they can hire people to help you with your case. Or provide another way. ("Sanpete provides Nothing")

* 109.) Access to Court includes: File legal papers, and to seek, and meet with lawyers and legal workers, Get reasonable access to law books, obtain help from other prisoners or help other prisoners. Be free from retaliation based on legal activity.

110.) "Sanpete County provides no legal access, they provide no other means for legal access."

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- 111.) This County jail Hinder's, Impedes, retaliates, prejudices, and tries to prevent litigation or access to redress the government.
- 112.) They do not have a law library. They don't hire people adequately trained in law. I was denied a Contract attorney program because, I'm not a sentenced Utah inmate. I'm pre-trial detainee. They won't print Case law. Exhibit 4
- 113.) Sgt. Gretchen Nunnley printed a few Cases for me, but was told by her hire up's to stop helping me. I asked her who, She would not tell me. Only Robert Braithwaite, and Brad Bawn are above her. Exhibit 4
- ★ 114.) May 2017, I was filing papers for Court in Wyoming. (Diverse Case.) They would not provide legal material for out of state, So I defaulted. Court dismissed my divorce. Amanda Confirmed two Separate request "No out of state Legal provided" Exhibit 6
- 115.) I started having problems getting legal Supplies, and materials, and needed to research how to proceed with a law Suit for Compensation for my property. So I requested envelopes, and paper. I was not being provide envelopes from deputies like I was supposed to per Brad Bawn in a reply to my grievance. Exhibit 16
- 116.) So Aug. 10th 2017 I wrote the ACLU. American Civil liberty Union. My mail was opened and read, not in my presense. So August 17th 2017 Dale Christensen Came into my Unit, and got Confrontational. Wanting to know why I needed So many envelopes, and why I wrote the ACLU. Exhibit 5 I filed a law Suit, requested help from ACLU.
- 117.) It's none of your business it's legal. "Well I already know I'm making it my business." He told me I will not be provided legal material to write the ACLU, and I will not be given Legal material for out of state which was Confirmed twice by Amanda Bennett. In Sept. 5th, and 9th 2017. (Retaliation because I filed a law Suit that had nothing to do with the jail.)
- ★ 118.) I filed a grievance, and appeal Brad Bawn responded September 25th that Sanpete County doesn't Consider the ACLU as legal. So now I had no access to the ACLU or out of state. I was told to request all legal material through Amanda Bennett. She will verify what I need, and get it to me. Exhibit 18, 19, 20, 21

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119.) During a "Secret Sgt. Meeting" The Captain told Amanda Bennett to Collect a debt for all the legal material I use. Paper, envelope, postage, photo Copies.

120.) In September the Court wanted a print out of my account. I first seen the debt no due process provided. I'm indigent, and Under Supreme Court supposed to be provided "free".

121.) Sanpetes idea of free materials is for indigent Supplies/Not Legal Supplies. They provide 2 envelopes, $\frac{1}{2}$ a pencil, 5 sheets of paper State issue Soap, deodorant, and Shampoo. That is what we get free. "No Legal Supplies are free". For 2 $\frac{1}{2}$ years my account has a negative balance. Exhibit 9

122.) "Conversion", So my State income Check got sent here. The jail policy says they can take 60% for medical debt. I've never seen the policy. The jail kept 100% of my money. I never gave consent or authorization. "I never even signed the check" (\$241 dollars.)

123.) The only reason why I knew I got the check was because I got a letter from the State tax Commission. So I requested to know where my money went, 4-16-2018. I reminded her 20% was supposed to go for the Court. 3 Separate Cases. She cut 3 Separate checks and kept the rest. She told me to Contact Brad Down. Exhibit 9

124.) Instead Robert Brathwaite answered, saying he doesn't need my signature to cash my check in my account. Something about 20% went to Court 60% went to debt which equated taking 100%. yet simple math $60 + 20 = 80$ So taking 100% still violates all rules and policies. 100% is more than 80 or 60. (Yield total \$241.34 gone.)

125.) So when I came to jail the police seized my property released it, and I lost everything I own. So I wanted to file a law suit. I never filed a law suit before that, and had no legal access. So I was stopped completely. So from April 2017 - September 2017 I was stopped from all legal access. (Staff would not help me or provide information.)

126.) I talked to a couple State inmates who gave me the Utah Self help Court address and phone number. So I called them. Requesting information to file a 1983. They sent me some info. So I wrote the federal Court. They sent me a packet I followed it Best I could.

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127.) Unable to Know what I'm doing, and Unable to research my first Case got dismissed. My Second Case I managed to get on appeal, and this is my fourth Amended Complaint.

128.) Only because my family is tired of how I get treated they bought me two legal books. I'm limited on locating Cases. The Cases I do have are not full they are brief. Better than what I had before. "Nothing"

129.) In the Appeals Court I applied federal rules of Civ. Procedure instead of Apparent rules. Because I don't have access to these. So my motion for default got denied. I filed a 23 page reply brief with exhibits. It got rejected. Leaving me 10 days. So 4 days to re-write 15 pages only, and I was unable to send exhibits. Because I didn't know how to do that without legal access to research (10 days but 6 days gone by the time I got letter)

* 130.) My life and liberty are at stake because of the medical issues I'm having. If my Case gets dismissed because I have no legal access I worry about my well being.

131.) I tried to get my public defender to help me. He said he is not a law library, and doesn't represent any other Case outside my Criminal Case. Exhibit 4

132.) While locked down for the 10 days, and the 1st 30 days ^(modified I did have access) ~~and~~ ~~Second 30 days modified~~ I had no access to phone or attorney. "None of the lock down's do I get access to phone." However the last lock down, I was told to fill out a request, and I could use the phone. I had issues, and it took six business days to finally get the phone call approved. (To my attorney.) July 2019.

133.) From April 1st - August 30th 2017 deputy Brandon Brown, Chad Imley, Dale Christensen Gretchen Nunnley would take my legal work to get photo Copies. I was not allowed to be there. Until I started Complaining because I felt my privacy was infringed. So finally Aug. 30th Sgt. Nunnley had a "Secret Sgt. Meeting" and they finally allowed me to be there to witness the photo Copies. Only Discovery would prove exact dates, and officers on that exact date.

134.) Sanpete County Considers indigent inmates with under \$ 3.00, and no account activity for two weeks straight. Then they provide legal material but not free.

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135.)

As a pre-trial detainee Under the Constitution I have a right to petition the government, right to privacy of legal mail, right to attorney, adequate law library or persons trained in law, or other means. Right to due process, right to be treated equal, No Cruel or Unusual punishment, no excessive Confinement, or false imprisonment. Not be stuck in non housing areas or be restrained or deprived outside recreation. Right to telephone. Free from retaliation.

- Every Single one of these, and probably more have been violated. -

136.)

I might not understand or said, the right words. I literally have applied the what, when, where and who' to the best of my ability, and Understanding. I've applied Exhibits to show exact dates, and evidence.

137.)

I've provided Supreme Court, 10th Circuit and other Cases on point. Accord:
[Media v City & County of Denver 960 F2d 1493, 1498 10th Cir 1992]

138.)

Without legal access I sure hope this is acceptable because having to keep re-writing this to figure out where I went wrong when, I'm the one being wronged is very frustrating.

139.)

Just to rephrase the important facts. I'm a pre-trial detainee without an Attorney, no law library, no Contract attorney, no people trained in law, no legal books or materials provided by the jail. They won't print case law, deny out of state legal access. Denied access to ACLU. Denied phone access. Made photo copies, and opened legal mail, invaded privacy. Charge an illegal debt for legal supplies, stole my money. If that is not violations to my rights I don't know what is.

140.)

I got my Case filed, and sent to the Court. Almost 2 years I've been trying to get my chance to be heard. Actual injury alone is not being able to locate Cases cited. related
[Benjamin v Kerik 102 F Supp 2d 157 S.D.N.Y 2000]

141.)

I'm Hindered, and impeded above, and beyond the grasp of just a simple delay or mistake. related [Penrod v Zavaras 84 F3d 1399 1403 10th Cir 1996.]

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"Church Service""VIII Case law facts"

- 142.) 1 [Young v. Coughlin 806 F2d 567, 570 2d Cir 1989.] Service whenever possible.
- 2 [Nolley v. County of Erie 776 F Supp 715 741-42 W.D. N.Y. 1991] Exclusion is 1st violation.
- 3 [Besnick v. Adams 348 F3d 763 767-68 & n. 6 9th Cir 2003] Slight Burden declare sect. to get diet meal.
- 4 [Jackson-Bey v. Hanslmaier 115 F3d 1091, 1097 2d Cir 1997]
- 5 [Baranowski v. Hart 486 F3d 112 125-26 5th Cir 2007] excluded from Services.
- 6 [William v. Lane 646 F Supp 1379, 1407 N.D. Ill. 1986 aff'd 851 F2d 867 877-78 7th Cir 1988] PC Unconst.
- 7 [Harris v. Lord 957 F Supp 471 474-75 SDNY 1997] Denial of Single Service Violation.
- 8 [Fogel v. Pierson 435 F3d 1252, 1264 10th Cir 2006] Admin Seg. denied Church Service.

- 143.) 9 [Collier v. Evans 199 G.A. App 763, 406 SE2d 90 G.A. App. 1991] False imprisonment improper disciplinary.
- 10 [Trobrough v. Hall 176 F3d 1087 1089 8th Cir 1999] \$100 per day.
- 11 Administrative Segregation.
- 12 [Manner v. Patterson 197 F.R.D. 244, 249-50 S.D.N.Y. 2000] \$25,000 30 days wrongful excessive Confinement.
- 13 [Holley v. Woolfolk 415 F3d 678 679-80 7th Cir 2005] Pre-trial detainees no punishment w/o due process.
- 14 [Sample v. Diecks 885 F2d 1099 1114 3rd Cir 1989] officials authorize a system to deprive.
- 15 [Hewitt v. Helms 459 U.S. 460, 470 n. 6 103 S.Ct 864 1983] vague phrases "need for control" threat to
- 16 [Pardo v. Hosier 611 F Supp 693, 698 C.D. Ill. 1985] Investigated but not told why.
- 17 [Mantign v. Henderson 841 F2d at 36] Placed in Seg. 4 days without notice.
- 18 [Hewitt v. Helms 459 U.S. at 472] hearing within reasonable time, a post deprivation does not sat. due process.
- 19 [US v. Lopez 327 F Supp. 2d 138, 144 D.P. R. 2004] Deathrow not rationally related to preserving order or safety.
- 20 [Howard v. Gringge 6 F3d 410 413 6th Cir 1993] Due process for transfers, program job, classification.
- 21 [Mitchell v. Dupnick 75 F3d 517 523-24 9th Cir 1995] Detainee entitled to due process. Not to be restrained.

"Recreation"

- 22 [Bailey v. Shillinger 828 F2d 651 10th Cir 1987] Cannot be deprived out side.
- 23 [Allen v. Sakai] 5 hrs per week.
- 24 [Keenan v. Hall 83 F3d 1083, 1089 9th Cir 1996] Rec out side of cell.
- 25 [Murphy v. Walker 51 F3d 719, 718 7th Cir 1995] No restraints Detainees. Liberty interest.

"
Access to Court

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- 145.) 25 [Ex parte v Hall 312 US 546 1941]
- 26 [Johnson v Avery 383 US 483 1969]
- 27 [Bounds v Smith 430 US 817 1977]
- 28 [Guilmore v Lynch 319 F Supp 105 111 ND CAL 1970] Right to fair hearing from the judiciary by all
- 29 [Younger v Guilmore 404 US 15 925 Ct 250 1971] means required
- 30 [Lehn v Holmes 364 F3d 862 7th Cir 2004] Failure to provide out of State Legal
- 31 [Benjamin v Kenik 102 F Supp 2d 157 S.D.N.Y 2000] Cannot locate Cases Cited
- 32 [United States v Cooper 375 F3d 1041 1051 10th Cir 2009] Pre-trial no law library if other means avail
- 33 [Pencod v Zavaras 84 F3d 1399, 1403 10th Cir 1996] Hindered legal access
- 34 [Milton v Morris 1985] [Taylor v Ist 1989] [Bribiesca v Galaza 2000] lawbooks, witnesses, other tools
- 35 [Media v City v County of Denver 960 F2d 1493, 1498 10th Cir 1992]
- 36 [Chandler v Coughlin 763 F2d 119, 114 2d Cir 1985] Free postage
- 37 [King v Atigeh 814 F2d 565, 568 9th Cir 1987]
- 38 [Guth v Kangas 951 F2d 1504, 1509-10 9th Cir 1991] Free for under \$12 in account. "Photo Copies"
- 39 [Canell v Multnomah County 141 F Supp 2d 1046, 1056 D. OR 2001] Photo Copies
- 40 [Harrington v Holshouser 741 F2d 66, 69 4th Cir 1984] Photo Copies
- 41 X [Ramos v Lamon 485 F Supp 122, 166 D. Cal 1979] aff'd 639 F2d 559 10th Cir 1980] Photo Copies
- 42 [Baltabin v Schilly 606 F Sup at 182] Conversion Can be brought under State Court Claims act
- 43 [Al-mustafa, I-shad v Spann 543 F Supp at 927] Conversion brought against individual
- 44 [Wright v Rivland 219 F3d 905, 913 9th Cir 2000]
- 45 [Hampton v Hobbs 106 F3d 1281, 1287 6th Cir 1997]
- 46 [Mahers v Halford 76 F3d 951 954 8th Cir 1996] Inmates have protectable property
interest in funds recieved from out side.
- 47 [State v O Conner 171 Ariz 19 827 P.2d 480 484-85 Ariz. App 1992]
- 48 [Benjamin v Sieraff 752 F Supp 140, 148 S.D.N.Y 1990] \$ 150 24 hr non housing relieving area

"
Deliberate Indifference

- 49 [Wilson v Seiter 501 US 294 1991] 55 [Ashley v Dilworth 8th Cir 1998]
- 50 [Farmer v Brennan 511 US 825 1994] 56. Cepulonis v Fair 1984 - Legal assistance required when
no law library available
- 51 [Vance v Peters 7th Cir 1996]
- 52 [Carter v Turnbull 2001]
- 53 [Helling v McKinnis 509 US 25, 33 1993]
- 54 [Perkins v Kansas Dept of Corrections 165 F3d 803 10th Cir 1999]

IX RELIEF REQUESTED

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- 147.) wherefore plaintiff respectfully prays that this Court enter judgment. Granting the plaintiff Anthony Jeffrey Christensen a declaration that the acts and omissions described here in violated my rights under the Constitution, and laws of the United States of America.
- 148.) Issue an injunction ordering defendants to release the plaintiff from punitive, and Administrative Segregation. Place him in general population with restoration of all rights, and privileges. Especially Church Service, out side recreation, and Self help groups.
- 149.) Expunge the disciplinary Convictions described from plaintiffs institutional record.
- 150.) Expunge or Stop the felonies from being on my record.
- 151.) Revise rule book so it doesn't violate the Constitution. ie provide rec yard, and phone to inmates in punitive Seg. Admin Seg or PC.
- 152.) Clear my institutional debt Completely. Provide "Legal Material" Free to indigents with under \$12 dollars Similar to [Guth v Kangas] (#38 Caselawfacts pg 23) ie photo Copys, paper envelope, postage.
- 153.) Provide a law library or Adequate persons trained in law or other available means per Court requirements.
- 154.) If Legal Demote, Captain Robert Braithwaite, Brad Bown, Jeff Nielsen, Gretchen Nunley and remove them from the grievance or disciplinary process.
- 155.) Remove Glenn Niell from IDHO Disciplinary Committee. "Add the disciplinary Appeal process to the rule book."
- 156.) A jury trial on all triable issues.
- 157.) Cost in this suit, and any thing else the Court finds just and fair.

161) Regardless every defendant by witnessing, participating, and failing to correct that misconduct is just as blame worthy as the one who started it. I have no plan, adequate or complete remedy at law to redress the wrongs described herein.

163) Plaintiff seeks "Punitive damages" against each defendant separately. For most the defendants I ask the Court help figure out what's fair. Because some defendants are hateful, malicious while others were just following orders.

162) Defendants willful, malicious, and down right Satanic Conduct did all that, and probably more. How do you get that back? How do you even put a price on it. 2 1/2 years!

161) Deprivation of phone to my daughter, and family, "My Attorney," Eat meals in my cell not with others, Deprived T.V., and visits. No contact with inmates. Stole my money. Made me unavailable to purchase, and enjoy Canteen, and hot food Canteen. Limited my writing supplies to 2 envelopes per week. Impeding Communications, Unable to purchase hobby materials or send nice stuff to my daughter or family. ie Drawings/Cratehett stuff. Added Complete Misery to my jail stay, and trying to terrorize, and add 2 Felony's facing up to 10 years in prison for deputies deliberate indifference twice. Putting my life, liberty in harms way. With Careless disregard, and Callous indifference.

160) Deprivation of church, and self help groups. for 2 1/2 years. Deprived out door recreation, and legal access. Defaults in my divorce, and other cases dismissed. Causing multiple hours of hand written motions rejected by the Court because, I don't have access to legal material. More unwanted legal debt, and lost my family payed to provide legal books when the jail would. Invasion of privacy of legal materials. Illegal debt.

159) "Not so much for mental or emotional." However for the loss of privileges, and quality of life in my prison living conditions. The loss of the limited liberty enjoyed by other prisoners. Resulting in Segregated Confinement, To my family, and reputation.

158) "Compensatory" damages I'd ask the Court help figure out what is fair against each defendant jointly, and severally.

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165.) However for Defendant Robert Braithwaite, and Brad Bown I seek ^{\$}100,000 punitive damages each. "Seperatly."

166.) For defendant Jeff Nielsen ^{\$}75,000 punitive damages. "Seperatly".

167.) For Gretchen Nunnley ^{\$}50,000 punitive damages. "Seperatly."

168.) Plaintiff has been, and will be irreparably injured by the Conduct of the defendants unless this Court grants the declaratory and injunctive relief which plaintiff seeks.

X. VERIFICATION

I Anthony Christensen have wrote, read the foregoing Complaint, and here by verify the matters alleged here in are true. Except as to matters alleged on information.

As to those, I believe them to be true. I Certify Under penalty of perjury that the foregoing is Correct pursuant to 28 USC Section 1746; 18 U.S.C. Section 1621

Executed at Sanpete County Jail

Dated this 12th day of August, 2019

Print Name: Anthony Christensen

Signature: 

Name: Anthony Jeffrey Christensen

Address: Sanpete County Jail PO Box 130 Mank UT. 84642

Pg 1 of 2

IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH
CENTRAL DIVISION

Anthony Jeffrey Christensen
Plaintiff,

APPENDIX OF EXHIBITS TO PLAINTIFFS
AMENDED COMPLAINT

v.

Robert Branthwaite "etal"
Defendants

Judge: Clark Waddoups

Civil No: 17-cv-01123-CW

1. Booking Report "Classification General population". 2pg April 2nd 2017.
2. Jail Policy - Grievance / Mail including revised 4pg. November 11 2011 - Jan 7, 2014
3. 1st Disciplinary (2pg) May 23 2017.
4. Law library / Contract Attorney information and requests (11pgs) May 26, 2017
5. ACLU Information (9pgs) August 10th 2017.
6. Denied out of state / Charged Legal Supplies (3pg) September 5, 2017
7. Denied out side rec. (1pg.) October 29th, 2017.
8. Request Church Service. (1pg) March 6 2018.
9. Account information / Tax money. (12pgs) April 12th 2018
10. Personal Review - Church - rec. (5pg) July 4th 2018.
11. 2nd Disciplinary with Appeal (16pgs) July 16th 2019
12. Felony Charge (1pg) July 25th, 2019
13. Motion - Equal protection (11pgs) July 28, 2019
14. 3rd Disciplinary Sanction (1pg) August 1st, 2019
15. Grievance - "Deliberate indifference" (2pg.) May 25, 2017
16. Grievance - Jail profits State inmates / Legal Access. (4pg) June 20 2017.
17. Grievance - Disciplinary Sanction (4pg) June 29 2017
18. Grievance - Legal Access (4pgs) August 20, 2017.
19. Grievance - ACLU Not LEGAL / Legal Access (4pgs) August 31, 2017
20. Grievance Appeal Level II - ACLU / Legal access (5pg) September 19, 2017.
21. Grievance ACLU / Legal access (6pg.) November 10th, 2017
22. Grievance Illegal Legal material debt (10pgs) January 10th 2018.
23. Grievance Church Service (8pgs) March 10th 2018
24. Declaration - me - Retaliation, out side rec. Legal access (2pg) November 3rd 2017

Exhibits Continued. Pg 2 of 2

25. Declaration - David Jeppsen - Rec yard with Calander (2pg) November 4th, 2017
26. Declaration - Me - Legal access / memorandum, (8 pg) November 4th, 2017
27. Declaration - Me - Legal Mail opened - (3pg) January 24th 2018.
28. Declaration - Luis Cuevas - Witness Legal mail open (1pg) January 24, 2018
29. Declaration - Me - Legal access (2pg) February 13, 2018
30. Declaration - James Nipper - No Conflict check "County inmate" (1pg) March 9, 2018
31. Declaration - Jesus Guerrero - No Conflict Check "State inmate" (1pg) March 9 2018
32. Declaration - Me - Rec yard while locked down. (1pg) July 27, 2018
33. Declaration - Brad Bown - defendant "Discrepancies" (4 pg) July 9, 2018
34. Declaration - Jeff Nielsen - defendant "Discrepancies" (6 pg) July 9, 2018
35. Declaration - Ross Bailey - defendant "Discrepancies" (4pg) July 5, 2018
36. Timeline / Calander 1pg April 2017 - December 2017

I Anthony Christensen declare under penalty of perjury these exhibits are true, and Correct. I've collected evidence, declarations, and wrote several grievances trying to address the illegal acts by the defendants.

In a pre-trial detainee never provided due process "Ever," I have a liberty interest in my liberty, life, and property. All I ever wanted was to be treated equal to other inmates.

The alleged victim in my Criminal Case has family who works at this jail, so I believe the defendants have taken justice in their own hands, by maliciously violating my Constitutional rights protected by the Constitution under the United States of America.

I read, wrote, and verify this information is true, and Correct pursuant to Utah Code Annotated Section 78B-5-705 2008 and Federal 28 U.S.C 1746.

Date: 8-12-2019

Print Name: Anthony Christensen

Signature: 